

Comments of Richard Atkins

NPRM 07-172

As a longtime advocate of AM radio and a former AM radio employee, I welcome the NPRM that will open the door to AM stations getting use of FM translators.

While I applaud the FCC action on this matter I wonder what took so long to look at the translator issue at hand.

Originally FM stations were permitted to use translators to fill in coverage or to get around natural barriers that if not there would have allowed coverage of more of the population still inside the otherwise unobstructed contour.

In this regard having FM stations on translators made perfect sense. And since FM stations needed all the help back in the day, it made sense to limit AM use of translators. Obviously the Commission wanted to do what it could to help FM win acceptance.

But along the way something happened that I have yet to be able to explain. How did the rules get changed to allow an FM station on one coast of this nation operate translators that are literally thousands of miles away. Based on the original regulations on translators this was not supposed to be the case. Natural limits on reception of FM stations off the air acted as the DeFacto limit on how far a station could be from the translator. The original regulation allowing a station to be picked up and used on a translator worked to the advantage of small towns that were willing to install systems at their own expense to get FM "in the air" in that town. Especially if it were located in an area that was a "dead spot" for incoming off the air signals. But to have translators fed from stations operating thousands of miles away when the locals have neither petitioned for nor opted to support installation of a translator to pick up that specific station thousands of

miles away is absurd on its face. This would make sense for an area that is extremely remote and isolated like parts of Alaska where local radio may not exist at all. But in these modern times even that area could receive multiple channels via satellite.

The FCC speaks of localism as do supporters of LPFM. How then can the Commission continue to support these abuses on translator operation when these frequencies could and should be vacated in lieu of operations that will in fact be local, in the original spirit of the use of translators? If I were a proponent of distant stations using translators I would have asked the question years ago; If the station is a thousand miles away what difference does it make if the modulation is FM or AM?

Stations or private companies that operate translators that are thousands of miles away should be put in a sunset mode. These translators should be switched to local service or delisted. Another way to achieve the same goal is to change the regulations so that any translator operated outside the XX (40?) dbu contour of the primary station, must get its signal from an over the air source where the signal is in fact the actual air signal of the primary station. No internet, satellite, phone line, microwave, inner city relay, streaming or another translator could be used. This simple change would free up many frequencies that could be used by AM stations in real need of help and LPFM stations that also wish to serve an area with programming that IS locally originated and subject to current rules regarding programming that responds to local issues.

Stations not in compliance, would have 18 months to either change the primary station to comply or have the license cancelled. Period. The market place would dictate if the licensee could sell the translator to a local operation or if no interest is shown the license would expire and be available for future application at

auction. Translators that continue to provide extended coverage past the XX (40?) dbu contour and do so with signals obtained off the air would be limited to no more than ten transmitters per licensee. This would ensure that a local or at least regional company is providing the service and would hold down trafficking in translators.

The Commission has shown excellent foresight in opening the question of AM stations on translators but the Commission will have to show as much or more wisdom in “clearing the deck” of operations that are wasting spectrum or guilty of improper use of spectrum, (albeit legal)

Serious thought should be given to an expansion of the FM band as was done on the AM band some years ago. Receiver manufacturers made the change to the AM band with little trouble or fanfare. In fact there was no real resistance to retooling radios to expand from 1600 to 1700 kHz.

The Commission states in its website that the last date for Analog TV in the country is February of 2009. This seems like the right time to expand the FM band to allow what used to be Channel six for the exclusive migration of AM stations to the FM band. This would be a monumental improvement that would allow some serious modernization to AM broadcasting. While the suggested NPRM on translators is excellent, all parties concerned know that what is really needed is a massive overhaul that will take most local broadcasters **off** AM altogether. In the end the AM band should return to doing what it has always done best, provide dependable long range regional broadcasting with a **few stations** that operate full time at 25 to 50 kilowatts unlimited.

If AM stations were allowed to move to an expanded FM band with certain restrictions from the beginning, this band could handle most, if not all AM stations now in operation. As a suggestion, stations that are now on the six local frequencies would be allowed 1000 watts at 150 feet. Stations that are now

regional class or higher, would be allowed 5000 watts at 300 feet. In most cases the current AM tower could be used.

Stations now operating as Class A Unlimited 50kw would get a reasonable FM assignment but would continue to operate on AM at 50kw as major providers of sky wave service. Technically this would not require as much effort as some have envisioned and it would allow HD broadcasting without all the problems now associated with AM HD.

The Commission refused attempts to put digital broadcasting in a new separate band as other countries have done. So we must come up with a radical way to achieve the same goal. The Commission needs to act now on the issue of AM HD broadcasting and move in another direction. While Ibiquity has a major stake in HD, we in the business are fully aware that for AM it may never be practical given the current band allocation, and at its best it cannot provide the model that FM HD can with the added channels.

Many major supporters of AM HD are now rethinking the issue. ABC radio has turned its HD carriers off at night due to “engineering issues.”

It is time for radical thinking at the Commission... this could be the start.

Thank you

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